

## **REMARKS**

Claims 1-20 were presented for examination. The Office Action mailed August 20, 2010 rejects claims 1-20. Claim 18 has been amended to correct a typographical error. Claims 1- 5, 7 – 16, and 18 - 20 remain pending in the application.

### **Claim Objections**

Claim 18 was objected to for depending upon cancelled claim 17. The error has been corrected. Claim 18 now depends upon pending independent Claim 16.

### **Rejection of Claims under 35 U.S.C. §103(a)**

The Office Action rejected claims 1-5, 11, 12, 15, 16, and 18 – 20 under 35 U.S.C. §103(a) as being unpatentable over Loveland (US Patent Publication No. 2003/0162555) in view of US Patent No. 7,092,977 to Leung et al. (hereinafter “Leung”). This rejection is respectfully traversed.

As previously explained, Applicants’ invention, as set forth in representative claim 1, recites a method for synchronizing a client having a client database with a server having a server database. The method comprises the steps of:

“calculating at the server, for a plurality of times and a plurality of clients, a document score for each document in a plurality of documents in the server database, each document score designating an importance relative to other documents of a respective one of the documents to a respective one of the clients at one of the times, each document score indicative of whether the document should be synchronized between the respective client and the server database; initiating a synchronization task at one of the clients, the synchronization task for updating documents in the client database to match documents in the server database, the

synchronization task specifying a threshold value that indicates the document score value for a document to be synchronized, and identifying the server and the server database for synchronization;

sending from the identified server and server database to the client a list of server documents produced based upon a comparison of the threshold value to the document scores; and

sending from the client to the identified server a fetch list based upon the list of server documents;

transmitting one of the documents in the server database to the client based on the fetch list.”

The Office Action states that the Applicants’ claimed step of “sending from the client to the identified server a fetch list based upon the list of server documents” is suggested by Loveland at [0056]. The Applicants respectfully disagree.

The Office Action states that the claimed step of “sending from the client to the identified server a fetch list based upon the list of server documents” is suggested at Loveland [0056] “e.g. the user may select particular data items to synchronize. Therein it is interpreted that the appropriate data items determined for synchronization which are selected by the user are synchronized and thus a list of items to be fetched for synchronization”.

However, the Applicants respectfully assert that this is insufficient to teach or suggest the Applicants’ claimed step of “sending from the client to the identified server a fetch list based upon the list of server documents”. Loveland is merely disclosing that a user can select particular data items to synchronize. Loveland is not disclosing that the user, or client, is sending to an identified server, a fetch list based upon the list of server documents. The list of server documents, as claimed, is “the list of server documents produced based upon a

comparison of the threshold value to the document scores”, as claimed. Loveland does not teach or suggest any method whereby a client should send to a server a fetch list based upon a list of documents that the server has sent to the client, and which the server has produced based upon a comparison of a threshold value a scores.

The Applicants respectfully assert that Leung adds nothing further to Loveland that would teach or suggest this claimed limitation. Thus, for the reasons above, Applicants submit that Loveland and Leung, taken alone or in combination, do not teach or suggest every element and limitation of independent claim 1 as now set forth. Thus Applicants respectfully request that the rejection of claim 1 be withdrawn. Independent claim 16 recites language similar to that of claim 1, and therefore is allowable for at least the reasons provided with respect to claim 1. Dependent claims 2-5, 7, 9, 11-15, and 18-20 depend directly or indirectly from one of the patentable independent claims, and incorporate all of the limitations of the respective independent claim. Thus these dependent claims are patentably distinguishable over the cited references for at least those reasons provided in connection with the independent claims and Applicants respectfully request withdrawal of the rejection of these dependent claims.

**Rejection of Claims 7-10 and 13 under 35 U.S.C. §103(a)**

The Office Action rejects claims 7-10 and 13 under 35 U.S.C. §103(a) as being unpatentable over Loveland and Leung, and further in view of US Patent Publication No. 2003/0172113 to Cameron et al. (hereinafter “Cameron”). The Office Action uses the disclosure of Cameron for the purpose of showing the additional limitations recited in these dependent claims. Regardless of whether or not Cameron shows such limitations, Applicants submit that

Cameron does not teach or suggest the limitations of claim 1 described above as missing from the other cited references. Thus Applicants submit that dependent claims 7-10 and 13 are allowable over the cited references for at least those reasons set forth above with respect to claim 1 and Applicants respectfully request withdrawal of the rejection of these dependent claims.

### **CONCLUSION**

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims that have not been expressed.

In view of the remarks made herein, Applicants submit that the application is in condition for allowance and request early favorable action by the Examiner.

If the Examiner believes that a telephone conversation with the Applicants' representative would expedite allowance of this application, the Examiner is cordially invited to call the undersigned at (508) 303-2003, or, preferably, at mobile number (617) 901-6786.

Respectfully submitted,

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